

Best Management Practices (BMPs)

Dan A. Hughes Co. San Francisco Creek #1 Well Del Norte, Colorado

1. **Operations:** All operations will be conducted in such a manner that full compliance is made with applicable laws, regulations (43 CFR § 3100 & 43 CFR § 3160), Onshore Oil and Gas Orders, the approved plan of operations and the conditions of approval. The operator is fully responsible for the actions of his subcontractors. A copy of all conditions will be furnished to the field representative to ensure compliance.
2. **Contractors:** The dirt contractor will be provided with an approved copy of the surface use plan of operations before initiating construction.
3. **Pad Construction:** Where soil conditions dictate, the use of stabilizing material would be used, otherwise existing natural surface materials would be used. For drainage, one 18 inch culvert will be installed where the access road enters the pad. A stormwater pollution prevention plan (SWPPP) will be designed for this location and submitted to the COGCC.
4. **Traffic Control:** Vehicular travel would be limited to the approved location and access roads. To limit constant traffic, we will concentrate traffic initially, coordinate with truck drivers to travel in tandem, and be aware of local traffic buildup with instructions to pull over and let others pass. Drilling water will be delivered at the beginning of the project and stored on site unless there is a loss of circulation and more water needs to be delivered. Drivers will take into consideration road conditions before bringing in equipment.
5. **Dust & Noise Abatement:** A water truck will be located on site and instructed to spray the road from pad location to the pavement as needed. Three tiers of One-ton straw bales will be stacked around the pad for noise and dust plume suppression.
6. **Light Abatement:** Drill rig lighting will be shrouded and directed downward, away from any nearby residences.
7. **Structures:** All permanent (in place for six months or longer) structures constructed or installed (including oil well pump jacks) will be painted a flat, non-reflective color to match the standard environmental colors, as determined by the Authorized Officer. All facilities would be painted within six months of installation. Facilities required to comply with the Occupational Safety and Health Act (OSHA) may be excluded from this requirement.
8. **Security:** All site security guidelines identified in 43 CFR § 3162.7-5 and Onshore Oil and Gas Order No. 3 would be followed. There will be a 24-hour security guard located at the entrance of the location to restrict entry of unauthorized people and vehicles during drilling.
9. **Production:** If a tank battery is constructed on this lease, it will be surrounded by a berm of sufficient capacity to contain 1½ times the storage capacity of the largest tank. All loading lines and valves will be placed inside the berm surrounding the tank battery. All oil production and measurement shall conform to the provisions of 43 CFR § 3162.7 and Onshore Oil and Gas Order

- No. 4. If water is produced from the well; steel coated water tanks will be used.
10. **Water Testing:** A baseline testing of water quality will be done before and after drilling. This testing was offered to all local landowners with existing water wells and/or springs. Data collected will be given to the COGCC for future reference.
 11. **Water Supply:** All water needed for drilling purposes will be acquired from a municipal source commercially.
 12. **Storm Water:** A specific stormwater pollution prevention plan (SWPPP) will be designed for this location and submitted to the COGCC.
 13. **Wastewater:** Wastewater will not be discharged on the surface at this site.
 14. **Waste Disposal:** No reserve pit will be constructed. A Closed loop drilling system will be used and all waste will be delivered to an approved disposal facility.
 - a. All rubbish and debris will be kept in containers on the well site, and will be hauled to an approved disposal site upon completion of drilling and completion operations and as needed during such operations. There will be no chemical disposal of any type.
 - b. Self-contained, portable toilets will be used for human waste, and the waste will be disposed at an approved landfill. Sanitation will comply with local and state regulations for the disposal of human waste.
 - c. All waste oil will be disposed of properly at approved facilities.
 15. **Spill Response:** If oil, lubricants and other petroleum or man-made products are accidentally spilled onto the ground surface, the BLM will be contacted and provided specific information about the spill and/or leak. Spills or leaks will be cleaned from the soil and any contaminated material will be bioremediated or disposed of at an authorized landfill. An emergency spill response program will be specifically designed for this project. If a spill or release impacts or threatens to impact an RSO stream, the operator shall notify the Colorado Department of Parks and Wildlife (CDPW) immediately following discovery of the release, and the spill or release shall be reported to the Commission in accordance with Rule 906.b.(4).
 16. **Surface Restoration:** Upon completion of drilling, all equipment that is not necessary for production shall be removed. All disturbed areas will be contoured to replicate the natural slope. A seed mix and rate as recommended by the BLM Authorized Officer will be used for this site.
 17. **Noxious Weeds:** The operator would monitor for and treat any noxious weeds along the right of way, and on the well pad. All equipment will be power washed prior to entering Federal lands to help mitigate the spread of noxious plants.
 18. **Fire Suppression:** Fire suppression equipment will be available to suppress any wildfires caused by construction or related activities. In the event of a wildfire, call the Pueblo Interagency Fire Dispatch Center (719-553-1600). All vehicles and equipment will carry water, shovels, and other firefighting equipment to extinguish any fires that may be accidentally started.

19. **Wildlife:** In order to minimize watershed damage and disturbance to game animals utilizing important seasonal wildlife habitat, drilling activity will only be allowed during the period from April 15 to December 15.